

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

BAOYANG CHEN,	:	CASE NO. 1:17-cv-00460-MRB
		Judge Michael R. Barrett
Plaintiff,	:	
v.	:	PLAINTIFF’S MOTION FOR
		EXTENSION TO SUBMIT
GSC OPPORTUNITIES, LP, et al.,	:	DEPOSITION DESIGNATIONS
Defendants.	:	

Now comes Plaintiff Baoyang Chen and hereby moves the Court for a 1-week extension of time to submit deposition designations. Plaintiff’s counsel has been short staffed over the last week with his associate out on paternity leave and his paralegal on PTO leave due to a family emergency. In addition, one of the deposition transcripts was received this past Tuesday and Plaintiff’s counsel has not had sufficient time in his schedule to review it and prepare designations. To further complicate this Murphy’s Law situation, Plaintiff’s counsel’s phone became inoperable on Thursday morning, July 31, 2025, which made it impossible to login into his work virtual desktop and access the case file. Fortunately, Plaintiff’s counsel’s phone has been repaired and access was gained the evening of August 1, 2025.

The one week extension would adjust the schedule as follows:

- 1) Plaintiff’s deposition designations: August 8, 2025 (original date August 1, 2025)
- 2) Defendant’s deposition designations: August 22, 2025 (original date August 15, 2025)

The 1-week adjustment will not affect the August 29, 2025 deadline to file objections to these designations.

Defendant's counsel was requested and Plaintiff's counsel has not received a response as of the time of filing this motion.

No prejudice will result in granting this extension that resulted from a series of unforeseen circumstances. Accordingly, Plaintiff respectfully requests that the Court grant this motion.

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s/ Christopher D. Cathey
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 1st day of August, 2025, I electronically filed the foregoing with the Clerk of the Court by using the Court's CM/ECF E-Filing System, which will send a notice of electronic filing to all counsel of record at their respective designated e-mail addresses, including:

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